

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
v.	)	<b>Case No. 1:22-CR-165</b>
	)	<b>Hon. Michael S. Nachmanoff</b>
<b>HATCHET M. SPEED,</b>	)	<b>Trial: January 17, 2023</b>
	)	
<b>Defendant.</b>	)	

**DEFENDANT'S PROPOSED JURY INSTRUCTIONS**

Defendant, Hatchet M. Speed, respectfully requests that the Court include the following instructions in its charge to the Jury.

Respectfully Submitted,

**HATCHET SPEED**

by counsel:

Jeremy C. Kamens  
Federal Public Defender for the  
Eastern District of Virginia

by: /s/  
Brooke Rupert  
VA Bar No. 79729  
Assistant Federal Public Defender  
1650 King Street, Suite 500  
Alexandria, Virginia 22314  
Telephone: (703) 600-0800  
Facsimile: (703) 600-0880  
brooke\_rupert@fd.org

Courtney Dixon

*Pro hac vice*

DC Bar No. 1766415

Assistant Federal Public Defender

1650 King Street, Suite 500

Alexandria, Virginia 22314

Telephone: (703) 600-0800

Facsimile: (703) 600-0880

courtney\_dixon@fd.org

**DEFENDANT'S PROPOSED DISPUTED JURY INSTRUCTION NO. A**

**The Essential Elements of the Offense Charged**

In order to sustain its burden of proof for the crime of possession of an unregistered firearm silencer under 26 U.S.C. § 5861(d) as charged in Counts One to Three of the indictment, the government must prove the following four essential elements beyond a reasonable doubt:

- (1) The defendant knew he possessed the object;
- (2) The defendant knew the object was a silencer;
- (3) As designed or redesigned, the silencer was capable of operating to diminish the report of a portable firearm; and
- (4) The silencer was not registered to the defendant in the National Firearms Registration and Transfer Record.